

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

RENEE GALLOWAY, *et al.*, on behalf of  
themselves and all individuals similarly situated,

Plaintiffs,

v.

JUSTIN MARTORELLO., *et al.*,

Defendants.

Case No. 3:19-cv-00314-REP

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS SETTLEMENT,  
SERVICE AWARDS, AND ATTORNEYS' FEES**

Plaintiffs, by and through counsel, submit this Motion for Final Approval of Class Settlement, Service Awards, and Attorneys' Fees. For the reasons explained in the accompanying Memorandum in Support, Plaintiffs respectfully request the Court to grant this Motion for Final Approval of the Class Action Settlement, as well as their request for reasonable service awards and attorneys' fees.<sup>1</sup> A copy of the proposed final approval order has been previously submitted (ECF 649-1 at pgs. 92-103).

Respectfully submitted,  
**PLAINTIFFS**

Date: September 27, 2024

\_\_\_\_\_  
/s/  
Kristi C. Kelly, Esq., VSB #72791  
Andrew J. Guzzo, Esq., VSB #82170  
KELLY GUZZO, PLC  
3925 Chain Bridge Road, Suite 202  
Fairfax, VA 22030

---

<sup>1</sup> Plaintiffs note that the funding of the settlement is not completed because the shares of the third-party private company have not been sold as of the date of this filing. Under the terms of the settlement, the liquidation must be completed by October 21, 2024. As discussed during the telephonic hearing with the Court on September 24, 2024, it is unknown whether the funding will occur at any time, including by the October 21, 2024 deadline. Plaintiffs are filing this motion in hopes that the settlement is timely funded.

(703) 424-7572  
(703) 591-0167 Facsimile  
Email: [kkelly@kellyguzzo.com](mailto:kkelly@kellyguzzo.com)  
Email: [aguzzo@kellyguzzo.com](mailto:aguzzo@kellyguzzo.com)

Leonard A. Bennett, VSB #37523  
CONSUMER LITIGATION ASSOCIATES, P.C.  
763 J. Clyde Morris Blvd., Ste. 1-A  
Newport News, VA 23601  
Telephone: (757) 930-3660  
Facsimile: (757) 930-3662  
Email: [lenbennett@clalegal.com](mailto:lenbennett@clalegal.com)

*Class Counsel*